UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE MEMPHIS DIVISION

)
SUZANNE C. CLARKE and)
CONISE P. DILLARD,)
On behalf of themselves and all others)
similarly situated)
)
Plaintiffs,)
)
V.) Civil Action No. 2:06-cv-02377-MaV
)
BAPTIST MEMORIAL HEALTHCARE)
CORPORATION; METHODIST)
HEALTHCARE,)
)
Defendants.)

KEITH IVY'S MOTION TO INTERVENE

Keith Ivy hereby moves this Court for an Order granting him intervention under Federal Rule of Civil Procedure 24(a)(2), or, in the alternative, Rule 24(b)(1)(B). A memorandum in support of this motion is attached, and a Complaint-in-Intervention is being filed herewith. A proposed order granting this motion is being submitted separately to the Court via email.

DATED: September 16, 2013 Respectfully Submitted,

By: /s/ Alan G. Crone Alan G. Crone Crone & McEvoy, 5583 Murray Rd., Suite 120 Memphis, TN 38119 Tel: (901) 737-7740

Fax: (901) 737-7740

Mark A. Griffin Raymond J. Farrow KELLER ROHRBACK LLP 1201 Third Avenue, Suite 3200 Seattle, WA 98101-3052 Tel: (206) 623-1900 Fax: (206) 623-3384

David P. Dean
Darin Dalmat
JAMES & HOFFMAN
1130 Connecticut Avenue, N.W., Suite 950
Washington, D.C. 20036
Tel: (202) 496-0500
Fax: (202) 496-0555

Daniel A. Small
COHEN MILSTEIN SELLERS
& TOLL PLLC
1100 New York Avenue, N.W.
Suite 500 West Tower
Washington, D.C. 20005
Tel: (202) 408-4600
Fax: (202) 408-4699

Sharon K. Robertson COHEN MILSTEIN SELLERS & TOLL PLLC 88 Pine Street, 14th Floor New York, NY 10005 Tel: 212 838 7797 Fax: (212) 838-7745

Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was filed electronically and notice of such filing was made electronically to Defendants' counsel pursuant to the Electronic Case Filing Rules of the United States District Court for the Western District of Tennessee Western Division on September 16, 2013.

Stephen J. Squeri Jones Day 901 Lakeside Avenue Cleveland, OH 44114 Telephone: 216-586-7237 Facsimile: 216-579-0212

Email: sjsqueri@jonesday.com

Attorney for Defendant Baptist Memorial

Healthcare Corporation

Corey W. Roush Robert F. Leibenluft Benjamin F. Holt Hogan Lovells US, LLP 555 Thirteenth Street, NW Washington, DC 20004 Telephone: 202-637-5600

Facsimile: 202-637-5910

Email: corey.roush@hoganlovells.com

Attorneys for Defendant Methodist Le Bonheur

Healthcare Corporation